

1 **KEN THERRIEN**
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4 **509.457.5991**

5 Attorney for:
6 **LUIS ALCALA ORTEGA**

7
8 **UNITED STATES DISTRICT COURT**
9 **FOR THE EASTERN DISTRICT OF WASHINGTON**
10 **(Honorable Stanley A. Bastian)**

11			
12	UNITED STATE OF AMERICA,)	NO. 20-CR-6002-SAB-6
13	Plaintiff,)	
14	vs.)	MOTION AND DECLARATION TO
15)	CONTINUE PRE-TRIAL
16	LUIS ALCALA ORTEGA,)	CONFERENCE AND TRIAL DATE
17	Defendant.)	
18)	Yakima– Without Oral Argument
			November 17, 2021 11:45 a.m.

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20 COMES NOW, Ken Therrien, the attorney for the defendant Luis
21 Alcala Ortega and moves the court for an order continuing the trial date from
22 January 24, 2021 to March 21, 2022. This motion is based upon the files and
23 records herein and the Declaration of Counsel filed herewith.

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30 MOTION AND DECLARATION TO CONTINUE
31 PRE-TRIAL CONFERENCE AND TRIAL DATE
Page 1

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DECLARATION

Ken Therrien upon oath deposes and states:

I am the Attorney for the defendant. I was appointed to this case on June 1, 2021 (ECF 322).

Mr. Alcala Ortega was arraigned on June 3, 2021 (ECF 332) Counsel for Mr. Alcala Ortega is requesting a continuance of the Trial date and time to file Pre-Trial Motions. The Trial date that is requested is March 21, 2022 at 9:00 a.m. in Richland, WA. The new Pre-Trial Conference requested date is March 9, 2022 in Richland, WA. Additional time is necessary for defense counsel to review discovery, investigate the case, prepare pre-trial motions, and prepare the case for trial. Counsel has contacted AUSA Stephanie Van Marter regarding the continuance of Trial to March 21, 2022. AUSA Van Marter is not opposed to this continuance request.

Dated this 15th day of November, 2021.

/s/ Ken Therrien

KEN THERRIEN, WSBA #20291
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on November 15, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

- Stephanie Van Marter, Assistant United States Attorney

s/ Ken Therrien

KEN THERRIEN, WSBA #20291

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